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**SENT VIA ELECTRONIC MAIL ONLY TO LFalin@sccourts.org;
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Ms. V. Claire Allen
Chief Deputy Clerk
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Mr. Melissa E. Simondi, Esq.
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Mr. Richard Giles Whiting, Esq.
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Mr. Gregory Samuel Foreman, Esq.
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RE: James Michael McMaster v James McMaster
Appellate Case No: 2021-000278

Dear Ms. Allen:

I apologize to for having to send another letter but unfortunately Mr. Whiting's letter has given me little choice.

First, the request for additional discovery in this matter is out of order. Opposing counsel is the Petitioner and he should have properly brought that request in his motion and/or in his reply. He has not done so, and therefore I object to his untimely request and respectfully request the court dismiss the request as untimely.

Second, my client does not object to the viewing by opposing counsel and the Petitioner to listening to all audio recordings already in their possession and presumably the petitioner can waive any such privilege with their attorneys. The intent of the respondent is to use only the recordings portions thereof at issue and before the court at trial.



Respectfully,


Rhett D. Klok